

ESSA Requirements for Equitable Participation of Private Schools

Federal Funding Conference
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WISCONSIN DEPARTMENT OF
PUBLIC INSTRUCTION

Carolyn Stanford Taylor, State Superintendent

Today's Topics

- Consultation process for Title I, II, III and IV services to private schools
- Private school responsibilities
- Role of the ombudsman
- Complaint process



LEA and Private Schools' Consultation

- Must occur during the design and development of programming.
- The Local Education Agency (LEA) and private school officials shall both have the goal of reaching agreement on how to provide equitable and effective programs for eligible private school children.



Consultation

Private School Affirmation form certifies that the consultation was:

- timely,
- meaningful, and
- the program design is equitable with respect to private school students.

IMPORTANT

Districts are advised to review the form before it is uploaded to WISEgrants.



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PRIVATE SCHOOL VERIFICATION Completed by the Private School Official

20 U.S.C. §§ 6320(b)(5) and 7881(c)(5).

Was the LEA consultation with the private school timely, meaningful, and is the program design equitable with respect to private school students?
Checking "No" below will alert the Wisconsin private school ombudsman to provide assistance.

- Yes No

If No, the private school must select a reason for requesting the Wisconsin private school ombudsman's assistance:

- The LEA did not provide consultation with the private school in a timely manner.
- The program design is not equitable with respect to eligible private school children.
- The LEA did not provide ample time and/or a genuine opportunity to discuss the following topic(s):

Identify the number associated with the topic listed on page one.

Provide a brief explanation of how the LEA did not provide a timely, meaningful consultation or why the program design is not equitable. *(Optional)*



ESEA Consultation

- How children's needs will be identified
- What services will be offered
- How, where, and by whom
- How the services will be academically assessed and how the results will be used to improve those services
- The size and scope of the equitable services, the proportion of funds that is allocated for such services, and how that proportion is determined



ESEA Consultation

- The method or sources of data that are used to determine the number of children from low-income families in participating school attendance areas who attend private schools
- How and when the LEA will make decisions about the delivery of services to such children, including consideration and analysis of the views of the private school officials on potential third-party providers



ESEA Consultation

- If the LEA disagrees with contracting with a third-party provider, the LEA will provide an analysis of the reasons in writing
- Whether the LEA will provide services directly or through another party
- Whether to provide equitable services by the funds allocated to each private school or to pool funds



ESEA Consultation

- When, including approximate time of day, services will be provided
- Whether funds will be transferred from Title II-A, and/or IV-A to Title I-A or Title III-A to increase services to eligible private school students participating in programs



ESEA Consultation

Each program covered by the LEA transferability authority is subject to equitable participation requirements. Before an LEA may transfer funds, it must engage in timely and meaningful consultation with private school officials representing the full spectrum of private schools in the district.



Checkpoint

Any questions?



Title I-A Private School Low Income Calculation

LEA shall have the final authority to calculate the number of children, ages 5-17, who are from low-income families and attend private schools by—

- Using the same measure of low-income as public schools
- Using the results of a survey
- Applying the low-income percentage of each participating public school attendance area
- Using an equated measure of low-income, correlated with the measure of low-income used to count public school children



Title I-A Equitable Share

The proportional share is calculated by determining the number of eligible Title I students in the private schools as compared to the number of eligible income public school students, and then applying that proportion to the total LEA allocation.

The proportional share must be calculated before any allowable expenditures and reservations by the LEA.

May occur each year or every 2 years.



Title I-A

- **Allocation** is generated by low-income students who, by grade level and address, would have attended a public Title I school.
- All students who would have attended a Title I school in the district are **eligible** for Title I services in the private school regardless of socio-economic status.
- **Services** are provided to eligible students identified as having the greatest academic need.
- Title I provides supplemental instruction by **appropriately licensed** teachers.
- LEA maintains responsibility for Title I services and resources.
- Services are secular, neutral, non-ideological, and address the needs of the eligible private school students.

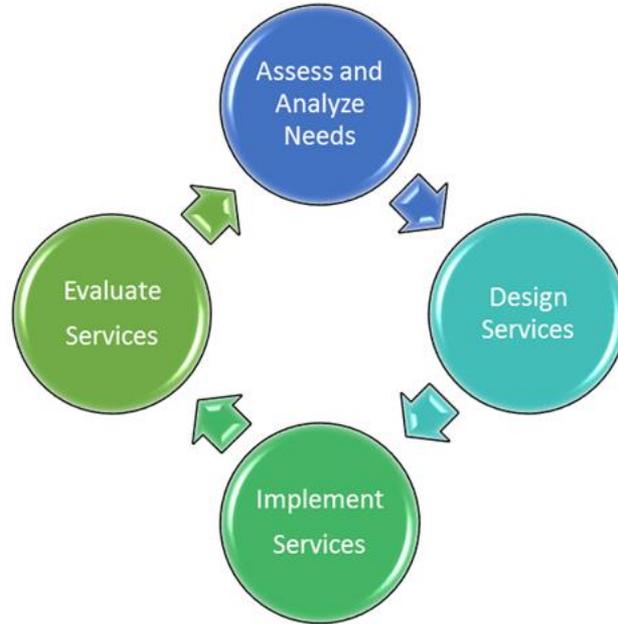


Title I-A

- Under Title I, Part A local education agencies (LEAs) are required to provide services for eligible private school students, their families, and teachers or other educational staff.
- Private school services are always provided in a targeted assistance model.
- Private school services should begin when public school services begin.



Continuous Process



Checkpoint

Any questions?



Private School Responsibilities

- Provide LEA with grade level and address for each private school student so that LEA can determine if student is eligible for Title I services.
- Provide LEA with student's socio-economic status so that LEA can determine if the student generates Title I funds.
- Conduct a needs assessment to determine Title I services to request.
- Using multiple assessments, determine students in greatest need of Title I services.
- Rank order students by greatest need for Title I services.



Title II-A

Purpose:

Provide all Wisconsin students equitable access to expertise and resources by supporting educator and principal preparation and professional growth.

Private School:

Provide total number of K-12 students attending the private school regardless of socio-economic status or residency.



Title I-A & II-A

- **Title I-A** can provide professional development for teachers working directly with Title I students.
- **Title II-A** can provide professional development to all teachers for the purpose of increasing student academic achievement.
- Professional development must be secular. The LEA is responsible for reviewing and approving requests prior to event.
- Allowable professional development includes training provided by the LEA, conferences, and book studies.



Title III-A

Purpose:

To help ensure that English Learners, including immigrant children and youth, attain English language proficiency and meet the same standards that all children are expected to meet.

Private School:

Provide grade and native language for English Learners (EL).



Title III-A

- Providing professional development
- Providing a Language Instruction Educational Program (LIEP)
- Providing and implementing other activities and strategies for LIEP for ELs

Examples: parent, family, and community engagement activities; coordinating services; and offering early college, high school, or dual or concurrent enrollment programs for ELs.



Title IV-A

Purpose:

Title IV, Part A was newly enacted in 2017-18 and is known as the Student Support and Academic Enrichment (SSAE) Grant. Title IV-A authorizes activities in three broad areas: access to a well-rounded education; improving school conditions for learning to ensure safe and healthy students; and improving the use of technology to improve academic achievement and digital literacy.

Private School:

Propose activity within one or more of the three areas.



Title IV-A Possibilities

- **Well-Rounded Education:** Providing access to fine arts, improving STEM programs, strengthening instruction in American history, civics, geography, etc.
- **Safe and Healthy Students:** Tobacco, alcohol and drug abuse prevention, anti-bullying programming, drop-out prevention, etc.
- **Effective Use of Technology:** Providing high quality professional development, developing courses using technology, etc.



Checkpoint

Any questions?



Ombudsman

To help ensure such equity for such private school children, teachers, and other educational personnel, the state agency involved shall designate an ombudsman to monitor and enforce the requirements of this part.



Ombudsman

The results of the agreements between public and private school officials made during consultation shall be transmitted to the ombudsman.



Checkpoint

Any questions?



Exemplar Practices

- Documentation of ongoing consultation meetings
- Equitable services handbook (program descriptions and services list)
- Evaluation of program effectiveness
- Review of data and private school needs
- Collaboration and coordination of services
- Having private school initial or sign agendas



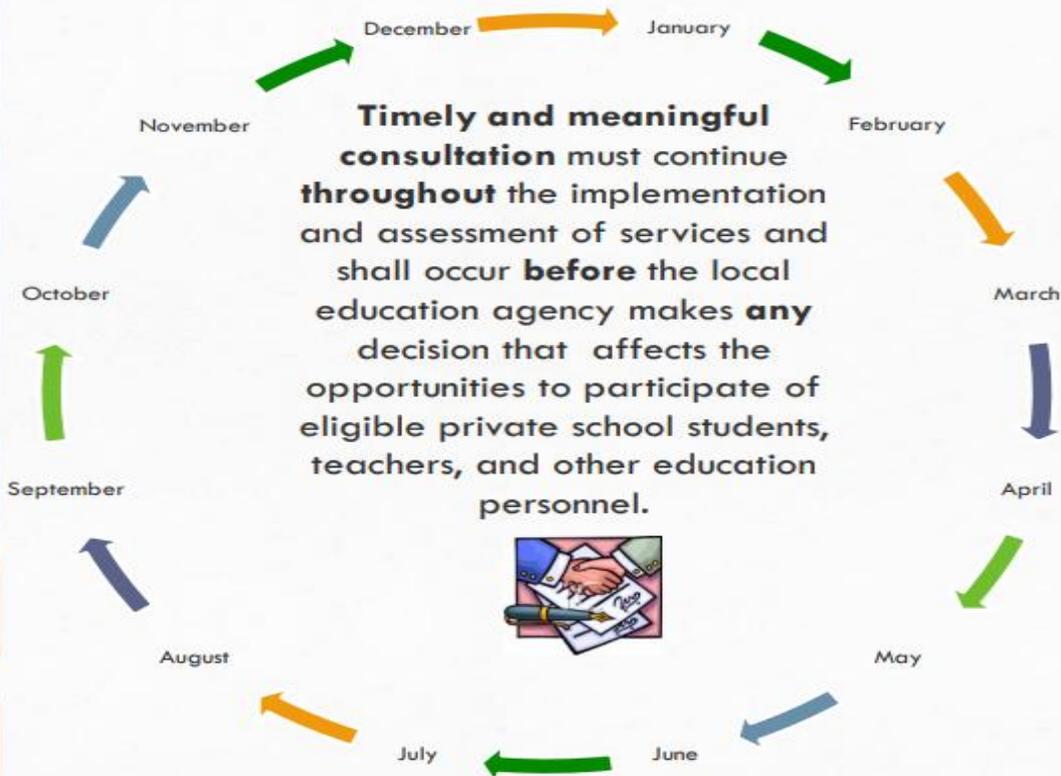
Don't Forget District Responsibilities!

- Meet the legal requirements
- Program oversight (instruction, budget, data, supervision, evaluation, etc.)
- Ensure budget items are allowable
- Written documentation (agendas, participants, minutes, etc.)
- Payments to vendor or individual (never directly to the private school)



CONSULTATION

Documentation of Consultation Required



Needs of Private School Students and Teachers

How & When Decisions are Made

Amount of Funds Available for Services and How the Amount Is Determined

How, where, when and by whom services are provided

Pooling of Funds

Size and Scope of Services

Providing Services Directly or Via Another Entity

Use of 3rd Party Provider and Written Explanation for Not Using 3rd Party Provider

Assessment of Services

Title I, Part A – Additional Topics: Method for Determining Number of Low-Income Students; Consolidation and Coordination of Title Funds for Services; Results of Consultation Agreement Must Be Transmitted to Ombudsman; Written Explanation for Disagreements



Resources

[ESSA TI-A Private School Equitable Share Calculator](#)

[ESSA Title II-A Equitable Share Calculator](#)



ESEA Consultants

Title I Directory: <https://dpi.wi.gov/title-i/consultant-directory>

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Thank you for attending!

Title I

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